



TALLGRASS LAND AND CATTLE COMPANY

Chere L. Shorter
AMS Fruit and Vegetable Program
USDA Stop 0247
Washington, DC 20250-0247

November 10, 2004

Re: Proposed Revision to US Standards for Grades of Olive Oil

Dear Ms. Shorter,

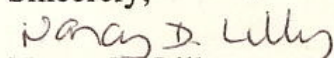
As a producer of olive oil and as a member of the Panel of Tasters for the California Olive Oil Council and the University of California, I ask that the proposed revisions to the US Standards for Grades of Olive Oil be adopted.

Our California industry is making every effort to produce a fresh and healthy product, which meets the international standards of quality and purity set by the International Olive Oil Council. The IOOC has clearly recognizable requirements in classifying olive oil, and the adoption of this clarified terminology would be a tremendous aid to consumers.

At present in the US marketplace there is great confusion among consumers about just what they are purchasing when they take a bottle of olive oil off of a shelf in their neighborhood supermarket or specialty store. Imported oils are not regulated by our government and, consequently, much of that product is mislabeled as being "extra virgin", for example, when a bottle often contains oil which has been refined or otherwise modified. Labels use misleading terms such as "light", which means nothing other than that the flavor is less intense while the caloric value is identical to any other bottle of olive oil. Much of the oil imported to this country is defective; much is rancid by the time it reaches our shelves, and a rancid oil has lost its beneficial polyphenols and anti-oxidants. American consumers are driven by price more often than not and, having gotten used to using many of these imported brands, do not realize they have been using oils which are defective and less healthy than the fresh product..

We in the California industry are trying to educate and assure consumers about olive oil quality through our seal program which gives them a clearly identifiable symbol which they can trust in the marketplace. The adoption of internationally accepted terminology for olive oils will assure American consumers that they are purchasing a healthy and pure commodity which meets international standards of production.

Sincerely,


Nancy D. Lilly